

Application No. 10/035,377
Amndt. dated: December 5, 2005
Reply to Office Action mailed: Sept. 8, 2005

REMARKS/ARGUMENTS:

Claims 1-19 are pending in this application; claims 1, 7, 9 and 14 have been amended. No claims have been cancelled and no new claims have been added. Consideration of the amended claims and the comments below are respectfully requested.

Claim Rejections under 35 US 102

Claims 1-19 were rejected under 35 USC 102(e) on the basis of US Patent 6,421,777 (Pierre-Louis). The rejection is believed inapplicable to the claims now presented and is respectfully traversed.

Claim 1 includes the recitation:

"A method of controlling a network boot for a plurality of client devices linked to a data communications network including a linked server and a network storage device, comprising: receiving at the network server a boot request from one of the client devices over the network; responsive to the received boot request, determining a target boot volume from a plurality of client image copies stored at the network storage device, . . . whereby the client is operable to remotely boot over the network from the target boot volume stored at said network storage device."

Claim 14 includes the recitation:

"A computer system for deploying multiple client devices communicatively linked to a network including a linked server and a network storage component, comprising: a plurality of client components that send boot requests over the network; . . . said network storage component to store the client image copies; and said server . . . receives the boot requests from the client components and provides the client components with remote access to the client image copies on the network storage component, including access to effect a remote boot from a boot image copy allocated to the specific requesting client component."

Claim 9 includes the recitation:

An external storage controller for managing network booting within a storage communication network including a linked server and a network storage device, comprising: a snapshot manager adapted for creating a snapshot of a base boot image, for storing the base boot image in said network storage device, for creating and storing in the network storage device a reverse snapshot based on the snapshot for client devices in the network, and for allocating one of the

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reverse snapshots to each of the client devices as client-specific image copies; and said server comprising an input and output server to receive a boot request from a client device broadcast on the network and responding to the boot request by providing remote access to a client-specific image copy stored in the network storage device allocated to the requesting client device to effect a boot operation by the client device without downloading said client-specific image copy.

Support for the amended claims may be found, for example, in Applicant's specification at page 5, lines 1-5; page 6, lines 14-21, page 9, lines 17-26, and page 15, lines 6-9, for example.

Claims 1, 9 and 14 are thus clearly not anticipated by Pierre-Louis who teaches, for example:

"The present invention discloses a server-based mechanism to monitor and change the remote boot images downloaded to a client. A mechanism is used to track the remote system's reboots, determine the state of the client computer, determine the appropriate boot image for the current state, switch the boot image when necessary so that right boot image is downloaded to the remote client system at the next boot request." (Col. 5, lines 9-16.)

Note also teaching of downloading the boot image to the remote client at col. 6, lines 22-33 and 55-58, and col. 12, lines 60-64, for example.

Pierre-Louis neither discloses nor suggests any of claims 1, 9 and 14 and withdrawal of the rejection of those claims is respectfully requested.

Claims 2-8, directly or indirectly dependent from claim 1; claims 10-13, directly or indirectly dependent from claim 9; and claims 15-19, directly or indirectly dependent from claim 14, are distinguished from Pierre-Louis for at least the same reasons as their parent claims, discussed above. In addition, there are further distinctions.

For example, the passage from Pierre-Louis cited in the Office Action in rejecting claims 5 and 13 (col. 5, lines 26-37) is not seen to disclose or suggest use of "updates from a client device" (claim 5) or "writes received from a particular client device" (claim 13) to modify client-specific image blocks or stored on the network server. Pierre-Louis col. 5, lines 26-37 refers to a "mechanism" (located at the remote server to "respond to a client's boot request" by, *inter alia*,

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changing "the remote boot image corresponding to the client on the server, . . ." (Emphasis added.). That is not what is claimed in claim 5 or claim 13.

Regarding the rejection of claim 18, Pierre-Louis col. 7, lines 21-65, relied on by the Examiner, clearly states: "In this example, a client 400 contains a storage device 404 on which various operations may be performed. In this example, the operation is an upgrade of the operating system. Server 406 will provide the remote boot services through a RIPL Server 408 and a state daemon 410. Further, a RPL Map 412 also is provided. RPL Map 412 provides an identification of which images are to be downloaded to a client. (Emphasis added) Col. 8, lines 38-46, also relied on in rejecting claim 13, includes the teaching: "Another function provided by the state program is to write a progress log with timestamps in the client-specific directory on the server." (Emphasis added.) These teachings by Pierre-Louis do not disclose or suggest the features claimed in claim 18.

Based on the above discussion, claims 1-19 are believed allowable as clearly distinguished from and patentable over Pierre-Louis.

CONCLUSION.

Favorable consideration and early allowance of the pending claims are respectfully solicited. If there are any remaining issues that could be resolved by discussion, a telephone call to the undersigned attorney at (425) 402-4638 would be appreciated.

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Respectfully submitted,

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